New EPA QA Guidance for Quality Management and QA Project Plans

Kelly Black
Neptune & Company, Inc.
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<th>6. AUTHOR(S)</th>
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<tr>
<td>Neptune &amp; Company, Inc., 1505 15th St., Suite B, Los Alamos, NM, 87544-3063</td>
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| 19a. NAME OF RESPONSIBLE PERSON |
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| unclassified |

Standard Form 298 (Rev. 8-98)
Prescribed by ANSI Std Z39-18
EPA CIO Policy 2105.0, May 2000, (formerly EPA Order 5360.1) only addressed environmental data collection and technology.

- EPA CIO Policy 2106.0, October 2008, expands quality assurance practices into Agency products and services.

- Policy 2106.0 was then clarified in December 2010 to specifically apply to products and services involving environmental data collection, production, and use.
What is EPA doing?

• These existing documents will be removed:
  • EPA Requirements for Quality Management Plans (QA/R-2)
  • EPA Requirements for Quality Assurance Project Plans (QA/R-5)

• Which are supported by these guidance documents:
  • EPA Guidance for Quality Management Plans (QA/G-2)
  • EPA Guidance for Quality Assurance Project Plans (QA/G-5)
What is EPA doing?

- EPA will adopt two *Quality Management Standards for Environmental Data Collection, Production, and Use*:
  - CIO Standard 2106-S-01 for use by EPA Organizations
  - CIO Standard 2106-S-02 for use by non-EPA Organizations

- These will be supported by two new guidance documents:
  - QA/G-5A: Guidance on Quality Assurance Project Plans
Who Needs QA?
Who Needs QA?
What Problems Will These Standards Resolve?

- Updated and clearer requirements
- Expanded to include models, data from external sources, IT sources
- Expanded to apply to all external agreements
- Replace QA/R-2 and QA/R-5 for non-EPA organizations
  - R-2 and R-5 requirements found non-enforceable
  - Limited use is permitted for existing agreements
Insufficient Information

E  AE  AOA
The G-2A document will provide guidance on:

- Quality Management Plan (QMP) preparation, submission, review, approval, and content
- Quality management requirements
- Personnel, external agreements, and records management
- Use of planning, data acquisition, verification and validation
- Use of a combined QMP/QAPP
Who Needs QA?
QA/G-5A will provide guidance on:

- Reminder/Check-list of QAPP essential elements
- **USE OF THE GRADED APPROACH**
- QAPP elements for the collection of data by direct measurement
- QAPP elements for evaluating the use of existing data from other sources (secondary use of data)
- QAPP elements for evaluating models
- Relationship of G-5A to the UFP-QAPP
Who Needs QA?
What’s New in G-5A

The new G-5A document improves on existing guidance specifically regarding:

- More comprehensive consideration of the use of data from existing sources
- An improved section on developing, evaluating, and using models
- “What-if” considerations
Sufficient Information

TH GRDD PPRCH

THE GRADED aPPROACH
G-5A and the UFP-QAPP

Similarities:

- **A QAPP THAT COMPLIES WITH THE UFP-QAPP REQUIREMENTS COMPLIES WITH THE NEW STANDARDS**
- Overall structure similar to R-5/G-5 and to the UFP-QAPP
- More attention to linking Project Quality Objectives to Measurement Performance Criteria
- Emphasis on documentation of criteria used for data collection and analysis
- Cross-references between documents
G-5A and the UFP-QAPP

Differences:

- G-5A wider in extent of coverage, but UFP-QAPP will be deeper in some sample analysis areas
- G-5A must cover the needs of Agency-wide data collection
- UFP-QAPP more suited to meet the needs of CERCLA, RCRA, and Federal Facilities
Who Needs QA?
Goal #1: Eliminate inconsistencies
- Share information during writing
- (Ed & Kelly’s phone bill is skyrocketing)

Goal #2: Share terminology as much as possible
- Cross-reference each other’s terms
- (Ed has terminology sticky notes all over his office)

Goal #3: Make switching between guidance easy
- Provide Matrix/cross-walk (included in G-5A)
- (Kelly updates the matrix every time the UFP-QAPP optimization committee recommends blending worksheets)
G-2A:  
• G-2A currently under internal review  
• Broader review draft of G-2A expected mid-May  

G-5A:  
• Working draft G-5A expected early May  
• Broader review draft of G-5A expected mid-June
Who Needs QA?